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## UNITED STATES DISTRICT COURT

## DISTRICT OF OREGON

## PORTLAND DIVISION

JERALD PARKER,

Case No. 3:19-cv-00265-MO

Plaintiff,

## **DECLARATION OF JOHN BURGESS**

v.

CRC HEALTH OREGON, LLC, dba Allied Health Services East, an Oregon corporation,

Defendants.

- I, John David Burgess, declare and state as follows:
  - 1. I am an attorney of record for Plaintiff in the above-captioned matter.
  - 2. Attached as Exhibit A is a true and correct copy of documents provided by

Defendant during discovery in the course of this case.

3. Attached as Exhibit B is a true and correct copy of deposition excerpts from the

corporate deposition of Alliant taken on November 18, 2019, with Ashleigh Reichle testifying on

behalf of defendant.

4. Attached as Exhibit C is a true and correct copy of deposition excerpt from the

corporate deposition of Alliant taken on November 18, 2019, with Dennis Antonetti testifying on

behalf of defendant.

5. Attached as Exhibit D is a true and correct copy of an excerpt taken from the

Acadia Healthcare Code of Conduct booklet, provided by Defendant during discovery in the

course of this case.

6. Attached as Exhibit C is a true and correct copy of deposition excerpt from the

deposition of Tyra Gates taken on November 18, 2019.

I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST

OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE

AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR PERJURY.

Dated: December 2, 2019

Law Offices of Daniel Snyder

s/John David Burgess

John David Burgess, OSB 106498

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Of Attorneys for Plaintiff

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